## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE REGULATORY AUTHORITY.

			*02 f	PR :	18	PM,	2	29
In re:	)					24, 44 447	y en	
Generic Docket To Establish UNE Prices for Line Sharing Per FCC 99-355, and Riser Cable and Terminating Wire as Ordered in Authority Docket 98-00123	) ) )	Docket No.	o6-oo	OFF CUTI 344	AE	SEGF	de la constante de la constant	ARY

## MOTION FOR CONTINUANCE

Covad Communications Company ("Covad") requests that the Hearing Officer grant Covad an additional two (2) days to respond to the Motion for Stay filed on April 10, 2002, by BellSouth Telecommunications, Inc. ("BellSouth") in the above-captioned proceeding.

Counsel for BellSouth states that BellSouth does not oppose this request but that BellSouth reserves the right to file a reply to Covad's response. Covad does not object to BellSouth filing such a reply.

BellSouth's Motion and the affidavit attached to it addresses a number of technical issues regarding "dual purpose line cards" and their use in BellSouth's NGDLC system. Covad is familiar with that technology and its use by other regional Bell carriers, especially SBC's "Project Pronto." Covad would like to address fully the issues raised by BellSouth and is in the process of collecting information from Covad's subject matter experts for the purpose of preparing an affidavit concerning the use of dual purpose line cards.

Under the Authority's procedural rules, parties are given ten (10) days to respond to a motion for a stay. Covad's response to the April 10 motion would therefore be due on Monday,

P4/18/02D

April 22. Because of the complexity of the issues raised in BellSouth's motion and the attached affidavit, Covad requests an additional two (2) days to respond. Covad's answer would therefore be due on April 24, 2002.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

Henry Walker

414 Union Street, Suite 1600

P.O. Box 198062

Nashville, Tennessee 37219

(615) 252-2363

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, and/or hand delivered to the following on this the 18<sup>th</sup> day of April, 2002.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

Sylvia Anderson, Esq. AT&T 1200 Peachtree St., NE Suite 8100 Atlanta, GA 30309

James Wright, Esq. United Telephone Southeast 14111 Capitol Blvd. Wake Forest, NC 27587

Charles B. Welch, Esq. Farris, Mathews, Branan & Hellen PLC 205 Capitol Blvd., Suite 303 Nashville, TN 37219

R. Dale Grimes, Esq. Bass, Berry & Sims, LC 2700 First American Center Nashville, TN 37238-2700 Dana Shaffer, Esq. XO Tennessee, Inc. 105 Molloy St., Suite 300 Nashville, TN 37201

Susan Berlin, Esq.
MCI Telecommunications d/b/a
MCI WorldCom
6 Concourse Parkway
Atlanta, GA 30328

Bennett Ross, Esq.
BellSouth Telecommunications, Inc.
675 W. Peachtree St., Suite 4300
Atlanta, GA 30375

John Spilman
Director of Regulatory Affairs and
Industry Relations
BroadSlate Networks, Inc.
675 Peter Jefferson Parkway, Suite 310
Charlottesville, VA 22911

790185 v1 101717-001 4/18/2002